

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CARMEN SANCHEZ)
Plaintiff,)
v.) Case No. 1:16-cv-07056
FEDERAL NATIONAL MORTGAGE) Judge: Hon. Andrea R. Wood
ASSOCIATION, JOHNSON, BLUMBERG &) Magistrate Judge: Hon. Young B. Kim
ASSOCIATES, and SETERUS, INC.)
Defendants.

**DEFENDANT'S MOTION TO JOIN DEFENDANTS', SETERUS, INC.'S AND
FEDERAL NATIONAL MORTGAGE ASSOCIATION'S, MOTION TO DISMISS**

NOW COMES Defendant, JOHNSON, BLUMBERG & ASSOCIATES, LLC ("JBA"), by and through its attorneys, HINSHAW & CULBERTSON, LLP, and hereby moves this Court to dismiss Count II of Plaintiff's Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6). For this motion, JBA joins in and adopts those arguments made by co-defendant, Seterus, Inc. ("Seterus"), in its Motion to Dismiss Count III of Plaintiff's Complaint, alleging various violations of the Fair Debt Collection Practices Act ("FDCPA"). In support thereof, JBA states as follows:

1. On September 6, 2016, Seterus filed its Motion, and accompanying Memorandum of Law, to Dismiss Counts I, III and IV of Plaintiff's Complaint jointly with co-defendant Federal National Mortgage Association ("Fannie Mae"). (Dkt. Nos. 25 & 26).
2. The arguments contained in the motion and memorandum of law, with respect to Count III alleging various violations of the FDCPA against Seterus, are equally applicable to JBA. (*Id.*).

3. JBA adopts and incorporates by reference the legal arguments asserted by Seterus as contained in the Motion to Dismiss and accompanying Memorandum. (*Id.*).

4. Plaintiff will not be prejudiced by JBA joining the Motion to Dismiss, and in fact, joining the motion will permit Plaintiff to file responses to each defendant's motions at the same time.

WHEREFORE, Defendant, JOHNSON, BLUMBERG & ASSOCIATES, LLC, respectfully requests that this Court grant its Motion to Join Defendants', Seterus's and Fannie Mae's Motion to Dismiss, and for such further relief as this Court deems just and appropriate.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2016, a copy of the forgoing Motion to Join Defendants', Seterus, Inc.'s and Federal National Mortgage Association's, Motion to Dismiss was filed electronically. Service of this filing will be made on all ECF-registered counsel by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

By: /s/ Jason L. Santos
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